

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

EXPERIMENTAL PRESORTED PRIORITY
MAIL RATE CATEGORIES, 2001

Docket No. MC2001-1

MOTION OF THE UNITED STATES POSTAL SERVICE
SEEKING POSTPONEMENT OF HEARINGS
(May 11, 2001)

For the reasons stated below, the United States Postal Service respectfully requests that the May 16, 2001, hearings currently scheduled for the purpose of cross-examination of witnesses be postponed until May 21, 2001.

On April 27, 2001, all parties to this proceeding were invited to an informal, off-the-record settlement conference. At that conference, parties identified outstanding issues and discussed proposals for resolution of those issues. Further discussion among the parties has resulted in the circulation of a draft Stipulation and Agreement for consideration by all parties. This instrument has the potential to serve as a vehicle for the resolution of outstanding material issues.

The Postal Service considers that the ratification of the draft Stipulation and Agreement could obviate the need for hearings in this proceeding. At the same time, the Postal Service recognizes that the possibility of a failure to achieve such ratification could require that the case proceed on a schedule similar to that reflected in the Attachment to Presiding Officer's Ruling No. MC2001-1/3 (April 20, 2001). Given the potential benefit to all parties and the Commission if the next week could be devoted to the pursuit of settlement, the Postal Service considers that a postponement of the current case schedule is warranted. Accordingly, the Postal Service proposes that the

hearings currently scheduled for May 16, 2001, be rescheduled for May 21, 2001, and that the remainder of the current schedule be modified by postponing all other events and deadlines by one week.

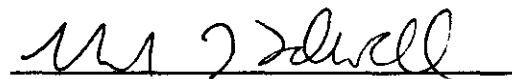
Either in person, by telephone, facsimile and e-mail, the Postal Service has informed all parties to this proceeding of its intent to file this motion and has circulated a draft for their review. The Postal Service can represent that the following parties are not opposed to this motion: Association of Priority Mail Users, Douglas F. Carlson, R.R. Donnelly & Sons Company, Magazine Publishers of America, Newspaper Association of America, National Newspaper Association, National Postal Mail Handlers Union, Office of the Consumer Advocate, Parcel Shippers Association, David B. Popkin, and United Parcel Service.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

A handwritten signature in dark ink, appearing to read "Michael T. Tidwell", is written over a horizontal line.

Michael T. Tidwell

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May 11, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", is written over a horizontal line.

Michael T. Tidwell

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